

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. ALAN SACERDOTE, et al.,

Plaintiffs,

vs.

NEW YORK UNIVERSITY,

Defendant.

:
: Case No.: 1:16-cv-06284
:
:

: ECF Case
:

: **DECLARATION OF IAN C. TAYLOR IN**
: **SUPPORT OF MEMORANDUM IN**
: **OPPOSITION TO PLAINTIFFS'**
: **MOTION TO EXCLUDE THE EXPERT**
: **TESTIMONY OF MARCIA WAGNER**
: **AND DANIEL FISCHER AND LIMIT**
: **THE TESTIMONY OF LASSAAD ADEL**
: **TURKI**

Ian C. Taylor hereby declares as follows:

I am an attorney at law admitted *pro hac vice* to practice before this Court and I am a partner with the law firm DLA Piper LLP (US), attorneys for Defendant New York University ("NYU") in this matter. I submit this Declaration to transmit to the Court true and correct copies of the documents referenced in the Memorandum of Law in Opposition to Plaintiff's Motion to Exclude the Expert Testimony of Marcia Wagner and Daniel Fischer and Limit the Testimony of Lassaad Adel Turki. I make this Declaration upon my personal knowledge and in support of NYU's Memorandum of Law in Opposition to Plaintiff's Motion to Exclude the Expert Testimony of Marcia Wagner and Daniel Fischer and Limit the Testimony of Lassaad Adel Turki.

1. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Counsel's Memorandum of Law in Opposition to Defendant's Motion to Exclude in *Abbott v. Lockheed Martin Corp.*, 3:06-cv-00701 (S.D. Ill. filed 9/11/06) (ECF No. 165).

2. Attached hereto as Exhibit 2 is a true and correct copy of the December 22, 2017 Expert Report of Marcia S. Wagner, Esq.

3. Attached hereto as Exhibit 3 are true and correct copies of excerpts of the certified transcript from the February 23, 2018 deposition of Marcia S. Wagner, Esq.

4. Attached hereto as Exhibit 4 is a true and correct copy of the February 6, 2018 Second Corrected Expert Report of Michael Geist.

5. Attached hereto as Exhibit 5 is a true and correct copy of the December 22, 2017 Expert Report of Daniel R. Fischel.

6. Attached hereto as Exhibit 6 are true and correct copies of excerpts of the certified transcript from the March 1, 2018 deposition of Daniel R. Fischel.

7. Attached hereto as Exhibit 7 is a true and correct excerpt from ROGER G. IBBOTSON, 2017 SBBI YEARBOOK STOCKS, BONDS, BILLS AND INFLATION (2017).

8. Attached hereto as Exhibit 8 is a true and correct copy of the January 22, 2018 Rebuttal Report of Gerald Buetow.

9. Attached hereto as Exhibit 9 is a true and correct copy of the January 22, 2018 Rebuttal Report of Lassaad Adel Turki, Ph.D.

10. Attached hereto as Exhibit 10 are true and correct copies of excerpts of the certified transcript from the February 7, 2018 deposition of Lassaad Adel Turki, Ph.D.

11. Attached hereto as Exhibit 11 is a true and correct excerpt of the certified transcript from the February 7, 2018 deposition of Michael Geist.

12. Attached hereto as Exhibit 12 is a true and correct copy of the February 13, 2018 Supplemental Rebuttal Report of Gerald Buetow.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
28th day of March 2018.

Dated: March 28, 2018
Washington, D.C.

/s/ Ian C. Taylor
Ian C. Taylor